

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

INTELLECTUAL VENTURES I LLC and  
INTELLECTUAL VENTURES II LLC,

Plaintiffs,

V.

CITIGROUP, INC., CITICORP, and  
CITIBANK, N.A.,

Defendants.

14 Civ. 4638 (AKH)

**ORAL ARGUMENT REQUESTED**

**DECLARATION OF OMAR A. KHAN IN SUPPORT OF DEFENDANTS  
CITIGROUP, INC.'S, CITICORP'S, AND CITIBANK, N.A.'S  
SUPPLEMENTAL CLAIM CONSTRUCTION BRIEF**

I, Omar A. Khan, declare as follows:

1. I make the following declaration based on my personal knowledge and of my own free will. I am over 21 years of age and have never been convicted of a felony. I am a counsel in the law firm of Wilmer Cutler Pickering Hale and Dorr LLP and am admitted to practice in New York. I represent Defendants Citigroup, Inc., Citicorp, and Citibank, N.A.

2. Attached hereto as Exhibit EEE is a true and correct copy of the transcript from the March 26, 2015 claim construction hearing in this case.

3. Attached hereto as Exhibit FFF is a true and correct copy of Intellectual I LLC's and Intellectual II LLC's claim construction slides for U.S. Patent No. 6,819,271 presented at the above-mentioned hearing in this case.

4. Attached hereto as Exhibit GGG is a true and correct copy of the transcript from the March 25, 2015 technology tutorial in this case.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: June 11, 2015  
New York, New York

/s/ Omar A. Khan  
Omar A. Khan